

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
Alto Maipo Delaware LLC, <i>et al.</i> , ¹)	Case No. 21-11507 (KBO)
)	
)	(Jointly Administered)
)	
Debtors.)	
)	

**NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
APRIL 26, 2022 AT 11:00 A.M. (ET)**

This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register no later than April 26, 2022 at 9:00 a.m. (ET).

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

https://debuscourts.zoomgov.com/meeting/register/vJlsd-qopjwiHidlPTNCQDmB_vIN_ur5LAI

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

CONTESTED MATTERS GOING FORWARD

1. SEALED - Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres [D.I. 349, 3/10/22]

Objection Deadline: March 17, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. REDACTED - Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres [[D.I. 350](#), 3/10/22]

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

- B. Declaration of Richard Minott in Support of (A) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief and (B) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement with MLP [[D.I. 354](#), 3/11/22]
- C. Senior Lenders' Joinder to Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement with MLP [[D.I. 375](#), 3/17/22]
- D. Official Committee of Unsecured Creditors' Statement in Support of (I) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP; and (II) Debtors' Motion for Entry of an Order Enforcing the Automatic Stay and Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP [[D.I. 381](#), 3/17/22]
- E. Debtors' Reply to Limited Objection and Reservation of Rights of Specially Appearing Minera Los Pelambres to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 395](#), 3/21/22]
- F. Notice of Filing of Revised Proposed Orders Regarding (A) Debtors' Motion for Entry of an Order Pursuant to Section 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres; and (B) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief [[D.I. 397](#), 3/21/22]
- G. Motion of Specially-Appearing Minera Los Pelambres for Leave to File Surreply in Support of Its Limited Objection and Reservation of Rights to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 405](#), 3/23/22]
- H. Declaration of Benjamin S. Beller in Support of the Surreply of Specially-Appearing Minera Los Pelambres in Support of Its Limited Objection and Reservation of Rights to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 406](#), 4/23/22]
- I. Order Granting Motion of Minera Los Pelambres for Leave to File Surreply [[D.I. 407](#), 3/23/22]

- J. Surreply of Specially-Appearing Minera Los Pelambres in Support of Its Limited Objection and Reservation of Rights to the Debtors' (Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 409](#), 3/23/22])
- K. Scheduling Order [[D.I. 461](#), 4/6/22]
- L. Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 524](#), 4/22/22]
- M. Declaration of Miranda Herzog in Support of Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 525](#), 4/22/22]
- N. Senior Lenders' Joinder and Statement in Support of Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 526](#), 4/22/22]
- O. Cerberus' Joinder to and Statement in Support of Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 527](#), 4/22/22]
- P. Joinder of AES Andes S.A. to (A) Debtors' Reply in Support of Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay Against Manzano, and (II) Granting Related Relief and (B) Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 528](#), 4/22/22]

Objections Filed:

- A. Limited Objection and Reservation of Rights of Specially-Appearing Minera Los Pelambres to (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 378](#), 3/17/22]
- B. Brief of Specially-Appearing Minera Los Pelambres on Debtors' Motion for Entry of an Order Pursuant to Sections 36 and 365 of the Bankruptcy Code Approving

Assumption of Agreement of MLP and (II) Motion to Enforce the Automatic Stay
[[D.I. 489](#), 4/13/22]

Status: This matter is going forward.

2. SEALED - Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (II) Granting Related Relief [D.I. 351, 3/10/22]

Objection Deadline: March 17, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. REDACTED - Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (II) Granting Related Relief [[D.I. 352](#), 3/10/22]
- B. Declaration of Richard Minott in Support of (A) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief and (B) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement with MLP [[D.I. 354](#), 3/11/22]
- C. Senior Lenders' Joinder to Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief [[D.I. 376](#), 3/17/22]
- D. Official Committee of Unsecured Creditors' Statement in Support of (I) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP; and (II) Debtors' Motion for Entry of an Order Enforcing the Automatic Stay and Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP [[D.I. 381](#), 3/17/22]
- E. Debtors' Reply to Limited Objection and Reservation of Rights of Specially Appearing Minera Los Pelambres to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 395](#), 3/21/22]
- F. Notice of Filing of Revised Proposed Orders Regarding (A) Debtors' Motion for Entry of an Order Pursuant to Section 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres; and (B) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief [[D.I. 397](#), 3/21/22]

- G. Motion of Specially-Appearing Minera Los Pelambres for Leave to File Surreply in Support of Its Limited Objection and Reservation of Rights to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 405](#), 3/23/22]
- H. Declaration of Benjamin S. Beller in Support of the Surreply of Specially-Appearing Minera Los Pelambres in Support of Its Limited Objection and Reservation of Rights to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 406](#), 4/23/22]
- I. Order Granting Motion of Minera Los Pelambres for Leave to File Surreply [[D.I. 407](#), 3/23/22]
- J. Surreply of Specially-Appearing Minera Los Pelambres in Support of Its Limited Objection and Reservation of Rights to the Debtors' (Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 409](#), 3/23/22])
- K. Scheduling Order [[D.I. 461](#), 4/6/22]
- L. Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 524](#), 4/22/22]
- M. Declaration of Miranda Herzog in Support of Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 525](#), 4/22/22]
- N. Senior Lenders' Joinder and Statement in Support of Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 526](#), 4/22/22]
- O. Cerberus' Joinder to and Statement in Support of Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 527](#), 4/22/22]

- P. Joinder of AES Andes S.A. to (A) Debtors' Reply in Support of Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay Against Manzano, and (II) Granting Related Relief and (B) Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 528](#), 4/22/22]

Objections Filed:

- A. Limited Objection and Reservation of Rights of Specially-Appearing Minera Los Pelambres to (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 378](#), 3/17/22]
- B. Brief of Specially-Appearing Minera Los Pelambres on Debtors' Motion for Entry of an Order Pursuant to Sections 36 and 365 of the Bankruptcy Code Approving Assumption of Agreement of MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 489](#), 4/13/22]

Status: This matter is going forward.

3. Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay Against Manzano and (II) Granting Related Relief [[D.I. 485](#), 4/12/22]

Objection Deadline: April 19, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. Debtors' Reply in Support of Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay Against Manzano, and (II) Granting Related Relief [[D.I. 521](#), 4/21/22]
- B. Joinder of AES Andes S.A. to (A) Debtors' Reply in Support of Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay Against Manzano, and (II) Granting Related Relief and (B) Debtors' Reply to Brief of Specially-Appearing Minera Los Pelambres on Debtors' (I) Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP and (II) Motion to Enforce the Automatic Stay [[D.I. 528](#), 4/22/22]

Objections Filed:

- A. Official Committee of Unsecured Creditors' Response to Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay Against Manzano, and (II) Granting Related Relief [[D.I. 509](#), 4/19/22]

- B. Objection of Ad Hoc Committee of Tort Claimants to Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay Against Manzano, and (II) Granting Related Relief [[D.I. 512](#), 4/19/22]

Status: This matter is going forward.

4. Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement with Manzano [[D.I. 487](#), 4/12/22]

Objection Deadline: April 19, 2022 at 4:00 p.m. (ET)

Objections Filed:

- A. Official Committee of Unsecured Creditors' Response to Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Manzano [[D.I. 510](#), 4/19/11]
- B. Emergency Motion of Comunidad de Aguas Canal El Manzano to Adjourn Hearing on Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Manzano [[D.I. 511](#), 4/19/22]

Status: This matter is going forward as a status conference only. The Debtors have agreed to adjourn the hearing on this motion to May 13, 2022.

Dated: April 22, 2022

Wilmington, Delaware

/s/ *Sean T. Greecher*

Pauline K. Morgan (No. 3650)

Sean T. Greecher (No. 4484)

S. Alexander Faris (No. 6278)

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Telephone: (302) 571-6600

Facsimile: (302) 571-1253

Email: pmorgan@ycst.com

sgreecher@ycst.com

afaris@ycst.com

- and -

Richard J. Cooper (admitted *pro hac vice*)

Luke A. Barefoot (admitted *pro hac vice*)

Jack Massey (admitted *pro hac vice*)

CLEARY GOTTLIEB STEEN & HAMILTON LLP

One Liberty Plaza

New York, New York 10006

Telephone: (212) 225-2000

Facsimile: (212) 225-3999

Email: lbarefoot@cgsh.com

rcooper@cgsh.com

jamassey@cgsh.com

Counsel to the Debtors and Debtors in Possession